



**CONESTOGA-ROVERS  
& ASSOCIATES**



8615 W. Bryn Mawr Avenue, Chicago, IL  
60631-3501  
Telephone: (773) 380-9933 Fax: (773) 380-6421  
www.CRAworld.com

May 8, 2013

Reference No. 038443-12

Ms. Leslie Patterson  
Remedial Project Manager  
United States Environmental Protection Agency  
Region V  
77 West Jackson Boulevard  
Mail Code SR-6J  
Chicago, Illinois  
60604

Mr. Steve Renninger  
On-Scene Coordinator  
U.S. EPA Region V  
Emergency Response Branch  
26 West Martin Luther King Drive  
Cincinnati, Ohio  
45268

Dear Ms. Patterson and Mr. Renninger:

Re: Progress Report: April 1 through 30, 2013  
South Dayton Dump and Landfill Site, Moraine, Ohio (Site)

This Monthly Progress Report is submitted in accordance with the Administrative Settlement and Order on Consent (ASAOC) for Remedial Investigation/Feasibility Study (RI/FS) Proceeding Under Sections 104, 107, and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. §§ 9604, 9607, and 9622 (United States Environmental Protection Agency [USEPA]) Docket No. V-W-06-C-852) effective August 15, 2006 (RI/FS ASAOC), and ASAOC for Removal Action Proceeding Under Sections 104, 106(a), 107, and 122 of the CERCLA, 42 U.S.C. §§ 9604, 9606(a), 9607, and 9622 USEPA Docket No. V-W-13-C-010, effective April 8, 2013 (Removal Action ASAOC), for the period of April 1 through 30, 2013.

The next Progress Report for the month of May 2013 will be submitted on or before June 10, 2013.

#### **SIGNIFICANT DEVELOPMENTS IN THIS REPORTING PERIOD**

On April 1, 2013, the Respondents provided USEPA and Ohio EPA with the OU1 Groundwater and Data Gap Investigation Work Plan by electronic mail (email) message. USEPA provided consolidated comments on the Work Plan on April 10, 2013. On April 30, 2013, the Respondents submitted a revised OU1 Groundwater and Data Gap Investigation - Phase 1A Work Plan, which incorporated the comments received from USEPA and Ohio EPA.

REGISTERED COMPANY FOR  
**ISO 9001**  
ENGINEERING DESIGN



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On April 3, 2013, the Respondents provided USEPA START contractor, Dynamac Corporation (Dynamac), with draft files for Vapor Intrusion (VI) sample result letters by email. On April 4, 2013, USEPA START contractor issued the sample result letters for Buildings 25, 26, 27, 29, and 33 (Figure 1). On April 8 and 23, 2013, USEPA START contractor provided the Respondents with revised VI Mitigation Summary Database Excel files by email.

On April 4, 11, 18, and 25, 2013, USEPA, Ohio EPA, USEPA START contractor, and the Respondents participated in conference calls regarding the status of vapor intrusion (VI) mitigation activities.

On April 4, 2013, USEPA START contractor provided the Respondents with questions regarding the Sierra Gas Corporation Model 2001 methane monitors installed at 1903 Dryden Road (Valley Asphalt) and 2031 Dryden Road (SIM Trainer). On April 25, 2013, the Respondents provided responses.

On April 4 and 11, 2013, the Respondents issued Request for Bid (RFB) Addendum 2 and Addendum 3, respectively, to prospective Ohio licensed radon mitigation subcontractors (Environmental Doctor and The Geiler Company). On April 12, 2013, the Respondents received electronic bids from Environmental Doctor and The Geiler Company. On April 23, 2013, the Respondents issued clarification requests to both companies regarding items presented or contained in the bids. On April 23 and 24, 2013, Environmental Doctor and The Geiler Company, respectively, provided clarification.

On April 5, 2013, USEPA executed the Removal Action ASAO. Based on the dates of the Return Receipts, the effective date of the Removal Action ASAO was April 8, 2013. On April 12, 2013, the Respondents provided USEPA with letter notification providing consultant, project coordinator, and insurance information, in accordance with ASAO Paragraphs 12, 13, and 78, respectively. On April 29, 2013, in accordance with ASAO Paragraph 17a, the Respondents provided USEPA, Ohio EPA, and the USEPA START contractor with the Draft VI Mitigation Work Plan.

On April 11 and 25, 2013, USEPA, Ohio EPA, CH2M Hill, and the Respondents participated in conference calls regarding OU1 RI/FS work.

On April 15, 2013, the Respondents informed USEPA that coordination of VI mitigation work with Valley Asphalt was not possible, on the advice of the Respondents' legal counsel.

On April 16, 2013, USEPA contacted CRA requesting an estimate for the total capacity of the sub-slab depressurization systems (SSDs) proposed for eight Site buildings. On April 16, 2013,



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CRA provided USEPA with estimated minimum and maximum SSDS capacity. On April 18, 2013, CRA provided USEPA with revised estimates, based on the specifications proposed in bids submitted by Ohio licensed radon subcontractors.

On April 18, 2013, the Respondents contacted the property management company for the Site owners (Mark Fornes Realty Inc.) and legal counsel for the property owners (Tim Hoffman of Dinsmore & Shohl, LLP) to request meetings with property owner representatives and building tenants to discuss the SSDSs, request approval for installation, and schedule installation dates. On April 19, 2013, Mark Fornes Realty Inc. provided a response to the Respondents rejecting the request for meetings. On April 24, 2013, the Respondents provided additional information regarding the meeting objectives and goals and reissued the request. On April 24, 2013 Mark Fornes Realty Inc. again rejected the request, and indicated the Respondents should submit the installation plans and dates directly to Mark Fornes Realty Inc. On April 25, 2013, the Respondents provided email notification of the situation to USEPA.

On April 17, 2013, Mark Fornes Realty, Inc. contacted CRA requesting information regarding drilling activities underway at 2139 Dryden Road. Following consultation with Ohio EPA, CRA provided Mark Fornes Realty with Bureau of Underground Storage Tank Regulations (BUSTR) files related to 2139 Dryden Road and informed Mark Fornes Realty that the drilling was apparently being completed on behalf of the owners of the Site (Mark Fornes Realty's client) and that the Respondents were neither involved in nor previously aware of the activities.

On April 30, 2013, the Respondents provided USEPA, Ohio EPA, and CH2M Hill with the OU2 Remedial Investigation Scoping Document, by email.

In April 2013, in order to monitor elevated lower explosive limit (LEL) readings, the Respondents collected weekly field screening measurements [methane (CH<sub>4</sub>), carbon dioxide (CO<sub>2</sub>), oxygen (O<sub>2</sub>), LEL, and photo-ionization detector (PID)] from Valley Asphalt Parcel 5054 Building 2 at 1903 Dryden Road, and SIM Trainer Parcel 5173 Building 1, at 2031 Dryden Road. The field screening values for Valley Asphalt Building 2 and SIM Trainer are provided in Tables 1 and 2, respectively. Table 3 presents field screening values measured by the Respondents in USEPA soil gas probe GP-2.



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#### **SUMMARIES OF ALL ANTICIPATED PROBLEMS AND PLANNED RESOLUTIONS**

- The Respondents will continue to work with USEPA as required to obtain Access Agreements with property owners.
- As discussed with USEPA previously, a number of the owners and tenants in buildings planned for vapor mitigation have expressed concerns regarding the intrusion that the VI sampling and mitigation activities have and will have on their business activities and have stated that they are reluctant to allow access. The Respondents will continue to work the USEPA to alleviate the owners' and tenants' concerns and to attempt to ensure continued access to the properties.

#### **PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- The Respondents and USEPA will continue to work together to complete the OU1 investigation and address vapor intrusion issues at and in the vicinity of the Site.
- The Respondents submitted the revised OU1 Groundwater and Data Gap Investigation - Phase 1A Work Plan to USEPA on April 30, 2013. The Respondents and USEPA will discuss the revised OU1 Groundwater and Data Gap Investigation Work Plan in May 2013 and the Respondents will make revisions as necessary.
- The Respondents and USEPA On-Scene Coordinator will continue to work together to discuss VI mitigation measures and implement the mitigation work plan.